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7 and ANDREW SALINAS

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 MARIA LAZOS, et al.,) No. CV 08-02987 RGK (SHx)
12 Plaintiffs,) [consolidated w/
13 v.) No. CV 08-05153 RGK (SH)]
14 CITY OF OXNARD, et al.,) **DEFENDANTS' PROPOSED**
15 Defendants.) **VOIR DIRE QUESTIONS**
16

)
17 AND CONSOLIDATED ACTION.)

18 Defendants CITY OF OXNARD, OXNARD POLICE DEPARTMENT, JOHN
19 CROMBACH, and ANDREW SALINAS submit the following list of proposed
20 voir dire questions:

21 1. (a) Have you or anyone close to you ever worked for,
22 donated to, received assistance from, or volunteered with the
23 American Civil Liberties Union (ACLU), Amnesty International, or a
24 similar organization?

25 (b) If yes, please describe which organization and your
26 involvement.

27 2. Have you ever been involved in a civil lawsuit? If yes,
28 please explain the situation and outcome.

1 3. (a) Have you, any family member, or a close friend ever
2 been the victim of a crime?

3 (b) If yes, was the crime reported to law enforcement?

4 (c) If the crimes were reported, were you satisfied with
5 law enforcement's response?

6 4. (a) Have you or has anyone close to you ever been a
7 victim of any type of violence?

8 (b) If yes, please explain what happened.

9 (c) If yes, was anyone arrested and/or charged with the
10 crime?

11 (d) Was there a conviction?

12 (e) How has this experience affected your feelings about
13 the criminal justice system?

14 5. Have you or has anyone close to you ever been the subject
15 of a criminal investigation of any type?

16 6. Have you or has anyone close to you ever been charged
17 with a crime or arrested?

18 7. Have you or has any member of your family ever owned any
19 firearms (i.e., guns)?

20 8. (a) Do you know anyone who has ever been injured or
21 killed by a firearm?

22 (b) If yes, was the shooting an accident or intentional?

23 (c) Please explain what happened.

24 9. (a) Have you seen, read, or heard any news or stories
25 about the Oxnard Police Department?

26 (b) If yes, what did you see, hear, or read?

27 10. Do you have any knowledge, feelings, or experiences that
28 may make you an inappropriate juror for this case?

1 11. Is there any reason (for example, a religious belief)
2 that would prevent you from engaging in deliberations or returning
3 a verdict for either side in this case?

4 12. (a) Have you or has anyone close to you ever worked in,
5 visited, volunteered at, or stayed in a jail or prison of any sort
6 for any length of time?

7 (b) If yes, please explain.

8 (c) If yes, how does this affect your opinions about the
9 corrections system in our country?

10 13. Have you or anyone close to you ever worked or volun-
11 teered with, or had any experience with, any of the following (if
12 yes to any of the following, please describe your involvement):

13 (a) Law enforcement (civil or military);

14 (b) FBI or CIA;

15 (c) U.S. Border Patrol;

16 (d) Immigration and Naturalization Service;

17 (e) Department of Homeland Security;

18 (f) Prosecutor's office, District Attorney, Attorney
19 General, U.S. Attorney;

20 (g) Psychotherapy, psychology, psychiatry, social work;

21 (h) Law;

22 (i) Firearms;

23 (j) Civil rights or constitutional issues;

24 (k) Politics;

25 (l) Private security;

26 (m) Forensics;

27 (n) Self-defense;

28 (o) Oxnard Police Department;

1 (p) Ventura County Sheriff's Department.

2 14. There may be some photographs introduced into evidence in
3 this case that are very graphic. Is there anything about looking
4 at and considering these pictures that would get in the way of your
5 serving as a juror in this case?

6 15. Do you feel that law enforcement personnel have too much
7 power? Why or why not?

8 16. How well do you think law enforcement agencies around
9 California have responded to community demands for more accounta-
10 bility for their actions?

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12 Dated: July ____, 2009

13 LAW OFFICES OF ALAN E. WISOTSKY

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15 By: _____
16 DIRK DeGENNA
17 Attorneys for Defendants,
18 CITY OF OXNARD, OXNARD POLICE
19 DEPARTMENT, JOHN CROMBACH, and
20 ANDREW SALINAS
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